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16 **UNITED STATES DISTRICT COURT**  
17 **CENTRAL DISTRICT OF CALIFORNIA**

18 K.A.,

19 Plaintiff,

20 v.

21 MINDGEEK S.A.R.L, et al.,

22 Defendants.  
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24  
25  
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Case No. 2:24-CV-04786-WLH-ADS

Hon. Wesley L. Hsu

**STIPULATION TO CONTINUE  
DEADLINE FOR PLAINTIFF TO  
FILE AMENDED COMPLAINT  
AND TO SET MOTION BRIEFING  
SCHEDULE**

Plaintiff K.A., by and through her undersigned counsel, and Defendants Visa Inc. (“Visa”), Colbeck Capital Management, LLC, CB Media Ventures LLC, CB Agency Services, LLC, and CB Participations SPV, LLC (the “CB Defendants”), Redwood Capital Management, LLC, Redwood Master Fund, Ltd., Redwood Opportunity Master Fund, Ltd., Manuel 2018, LLC, Ginogerum, LLC, and White-Hathaway Opportunity Fund, LLC (the “Redwood Defendants”), and MG Freesites Ltd, MG Premium Ltd, MindGeek USA Incorporated, MG Global Entertainment Inc., and 9219-1568 Quebec Inc. (the “MindGeek Defendants”), by and through their undersigned counsel, hereby stipulate and agree as follows:

**WHEREAS**, through this stipulation, the Parties request that the Court enter an order extending the current deadline for Plaintiff to file an Amended Complaint; extending the current deadline for Defendants to respond to the operative complaint; and, for the Defendants that file motions to dismiss, setting a briefing schedule for the motion, opposition, and reply briefs. The Parties make this stipulation in light of the Court’s orders last week in this action (ECF No. 166) and the other thirteen actions,<sup>1</sup> and the similar stipulation filed in the case captioned *Fleites v. MindGeek, S.à.r.l., et al.*, No. 2:21-cv-04920-WLH-ADS (C.D. Cal. June 17, 2021). The Parties request that the Court align the schedules in those actions and this action, which the Parties believe is the most efficient way to proceed for both the Court and all Parties.

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<sup>1</sup> *N.L. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-04788-WLH-ADS (C.D. Cal. June 7, 2024); *L.T. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-04791-WLH-ADS (C.D. Cal. June 7, 2024); *T.C. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-04795-WLH-ADS (C.D. Cal. June 7, 2024); *X.N. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-04800-WLH-ADS (C.D. Cal. June 7, 2024); *N.Y. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-04801-WLH-ADS (C.D. Cal. June 7, 2024); *J.C. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-04971-WLH-ADS (C.D. Cal. June 12, 2024); *W.L. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-04977-WLH-ADS (C.D. Cal. June 13, 2024); *C.S. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-04992-WLH-ADS (C.D. Cal. June 13, 2024); *S.O. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-04998-WLH-ADS (C.D. Cal. June 13, 2024); *L.S. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-05026-WLH-ADS (C.D. Cal. June 14, 2024); *W.P. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-05185-WLH-ADS (C.D. Cal. June 20, 2024); *A.K. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-05190-WLH-ADS (C.D. Cal. June 20, 2024); and *J.L. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-07046-WLH-ADS (C.D. Cal. June 20, 2024).

1       **WHEREAS**, Plaintiff's current deadline in this action to file an Amended  
2 Complaint is November 27, 2025. Should Plaintiff file an Amended Complaint, Visa,  
3 the CB Defendants, and the Redwood Defendants' current deadline to file motions to  
4 dismiss is December 30, 2025. *See* ECF No. 617. The MindGeek Defendants' current  
5 deadline to respond to the operative complaint is December 30, 2025. *See* ECF No.  
6 166.

7       **WHEREAS**, for the reasons stated above, the Parties agree to the following  
8 schedule:

- 9           • Plaintiff shall file their Amended Complaint, if any, no later than  
10           December 15, 2025;
- 11           • If Plaintiff files an Amended Complaint, Defendants shall file their  
12           Motions to Dismiss, or otherwise respond to, the Amended Complaint  
13           no later than January 30, 2026;
- 14           • Plaintiff shall file their Opposition to Defendants' Motions to Dismiss  
15           no later than February 27, 2026; and
- 16           • Defendants that filed Motions to Dismiss shall file their Replies in  
17           support of their Motions no later than March 27, 2026.

18       **WHEREAS**, by entering into this stipulation, Plaintiff reserves their rights to  
19 conduct party and third-party discovery to the extent permitted by this Court while  
20 Defendants' motions to dismiss are pending; and

21       **WHEREAS**, by entering into this stipulation, Defendants reserve all rights to  
22 object to any party and third-party discovery sought by Plaintiff while their motions  
23 to dismiss are pending.

24       **NOW THEREFORE**, the Parties hereby stipulate and agree to the following  
25 schedule, unless a subsequent order of this Court extends or has the effect of further  
26 extending such deadlines:

- 27           • Plaintiff shall file their Amended Complaint, if any, no later than  
28           December 15, 2025;

- If Plaintiff files an Amended Complaint, Defendants shall file their Motions to Dismiss, or otherwise respond to, the Amended Complaint no later than January 30, 2026;
- Plaintiff shall file their Opposition to Defendants' Motions to Dismiss no later than February 27, 2026; and
- Defendants shall file their Replies in support of their Motions to Dismiss no later than March 27, 2026.

**IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

1 Dated: November 14, 2025

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20 Dated: November 14, 2025

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22 *Attorneys for Redwood Defendants*

23 Dated: November 14, 2025

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*Attorneys for the MindGeek  
Defendants*

**L.R. 5-4.3.4 ATTESTATION**

The undersigned attests that all other signatories listed, and on whose behalf this filing is submitted, concur in this filing's content and have authorized this filing.

Dated: November 14, 2025

By: /s/ Lauren Tabaksblat

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